

# The Ecodesign for Sustainable Products (ESPR) & Digital Product Passport (DPP) & Regulatory Roundup

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# Regulatory Roundup

- **PFAS**
  - CA AB1817 and NY S1322 - January 1, 2025
    - CA AB 347 - Clarifications, but no delays
  - EPA - Delayed - Reporting July 2025 - January 2026
- **US EPR - Extended Producer Responsibility**
  - Register ASAP with Circular Action Alliance
- **Canada**
  - Labor Reporting - In force since May 2024
  - Plastics Reporting - September 29, 2025
  - PFAS Reporting - January 29, 2025
- **EU**
  - PFHxA Ban (C6) - October 2026
  - Cyclosiloxanes Ban - June 2026
  - EPR Reporting - In force
- **California**
  - SB253 - Climate Corporate Data Accountability Act - 2026 and 2027
  - AB1305 - California Voluntary Carbon Market Disclosures Act - January 1, 2025
  - SB707 - Responsible Textile Recovery Act - TBD





PART 1:

# What is ESPR?



# What is ESPR?

The Ecodesign for Sustainable Products Regulation (ESPR) is the EU plan to require more sustainable and circular products on the European market.

ESPR =  
framework  
legislation

It does not set  
specific measures.  
Rather, it enables  
their later  
adoption

Framework legislation

Product-specific measures  
based on detailed impact  
assessment

Regularly updated  
**multiannual working  
plans** setting out priorities





PART 2:

# Key Pillars

# Key Pillars

- **Sustainability Standards**
  - The ESPR will establish new ecodesign rules for products, focusing on durability, repairability, and the use of recycled materials.
- **Waste Reduction and Prevention**
  - The regulation discourages the destruction of unsold products, promoting reuse, recycling, and resale instead.
- **Circular Design**
  - The ESPR encourages circularity by designing products that can be easily repaired, reused, and recycled.
- **Digital Product Passport**
  - Products will need a Digital Product Passport to track product information such as material composition and sustainability credentials, improving transparency and recyclability.







# Key Pillar – Sustainability Standards

The product sustainability standards under the ESPR aim to enhance the environmental performance of products by focusing on durability, repairability, and resource efficiency throughout their lifecycle. They also emphasize the use of recyclable materials and limit hazardous substances to reduce environmental impacts and promote a circular economy.

## **Durability and Reliability**

Requirements focus on extending product life, including measures of guaranteed lifetime, resistance to aging, and real use stress factors.

## **Repairability and Maintenance**

Products must be designed for easy disassembly, with standards ensuring the availability and affordability of spare parts and maintenance instructions.

## **Recycling and Reuse**

Standards promote the use of recyclable materials and non-destructive disassembly to facilitate high-quality recycling.

## **Energy and Resource Efficiency**

Regulations limit energy and resource use throughout the product lifecycle, considering factors like water consumption, material footprint, and recycled content.

## **Substances of Concern**

Restrictions on hazardous substances are implemented to enhance recyclability and reduce environmental impacts.



# Key Pillar – Waste Reduction and Prevention

**The waste prevention measures in the ESPR are designed to reduce the destruction of unsold products and increase reuse, refurbishment, and recycling. This approach supports a circular economy by ensuring that products are not prematurely discarded, maximizing their potential lifecycle.**

## **Prohibition of Destruction**

The ESPR mandates that economic operators take reasonable measures to avoid destroying unsold consumer products.

## **Disclosure of Unsold Goods**

Companies must disclose the number and type of unsold products discarded annually, including reasons for discarding.

## **Reuse and Recycling**

Operators are required to report the proportion of discarded products directed toward reuse, recycling, or energy recovery.

## **Transparency Obligations**

Large enterprises must publish this information on their websites annually, with smaller enterprises receiving more time to comply.

## **Enforcement and Verification**

The European Commission will set guidelines for verifying the reporting and compliance of unsold goods destruction prevention.



# Key Pillar – Circular Design

The circular design principles under the ESPR focus on creating products that support a circular economy by prioritizing longevity, repairability, and recyclability. These principles aim to minimize waste and optimize the use of resources through the entire lifecycle of products.

## Durability and Lifetime Extension

Product designs must incorporate durability features, ensuring that they can withstand regular use and last longer.

## Repairability and Upgradeability

Products must be designed for easy disassembly and repair, including ensuring access to spare parts and repair instructions.

## Recyclability

Design strategies should allow for easy dismantling and recycling of materials, encouraging the reuse of components at the end of a product's life.

## Resource Efficiency

Circular design focuses on reducing the use of raw materials by optimizing resources during production and minimizing material waste.

## Sustainable Materials

Priority is given to using recyclable or renewable materials, reducing dependency on virgin resources.



# Focus on Products

**The ESPR aims to significantly improve the circularity, energy performance and other environmental sustainability aspects of products placed on the EU market.**

A sustainable product is likely to display one or more of the following characteristics:

- Uses less energy

- Lasts longer

- Can be easily repaired

- Parts can be easily disassembled and put to further use

- Contains fewer substances of concern

- Can be easily recycled

- Contains more recycled content

- Has a lower carbon and environmental footprint over its lifecycle



# Focus on Products

Many aspects of product design, development and sourcing will need to be evaluated, adopted and documented.

This will result in significant changes across the full product lifecycle.





# Key Pillar – Digital Product Passport (DPP)

**The Digital Product Passport (DPP) aims to enhance transparency and traceability across product value chains by centralizing key product information in a digital format. The DPP supports various stakeholders, including consumers, manufacturers, and regulators, by providing easy access to essential data about a product's sustainability, compliance, and lifecycle performance.**

## **Access to Product Information**

The DPP provides key actors across the supply chain—such as manufacturers, repairers, and recyclers—with access to product data based on their roles and access rights.

## **Sustainability and Traceability**

It improves product traceability, helping monitor compliance with sustainability regulations and environmental performance throughout a product's lifecycle.

## **Data Security and Reliability**

The DPP is designed to ensure data accuracy, integrity, and security, with measures to prevent unauthorized modifications or fraud.

## **Use of Open Standards**

All data included in the DPP must comply with open, interoperable formats to ensure broad accessibility and avoid vendor lock-in.

## **Product Lifecycle Extension**

The DPP facilitates product reuse, repair, and recycling by tracking detailed information on product components and materials, which is crucial for extending product lifecycles.



## PART 3:

# Apparel, footwear, textiles and steel

# The ESPR Process

The ESPR will be implemented in phases, with detailed requirements introduced progressively through delegated acts.

The first ESPR delegated act is currently expected at the earliest in 2026.

Highest priority categories are textiles, iron and steel.

Next highest are aluminum, furniture, paints, lubricants, chemicals (plastics), electronics.

These products were arrived at through assessments.

Products will be evaluated through measures.



# Assessment

Environmental assessment of the top end-use and *intermediate* products

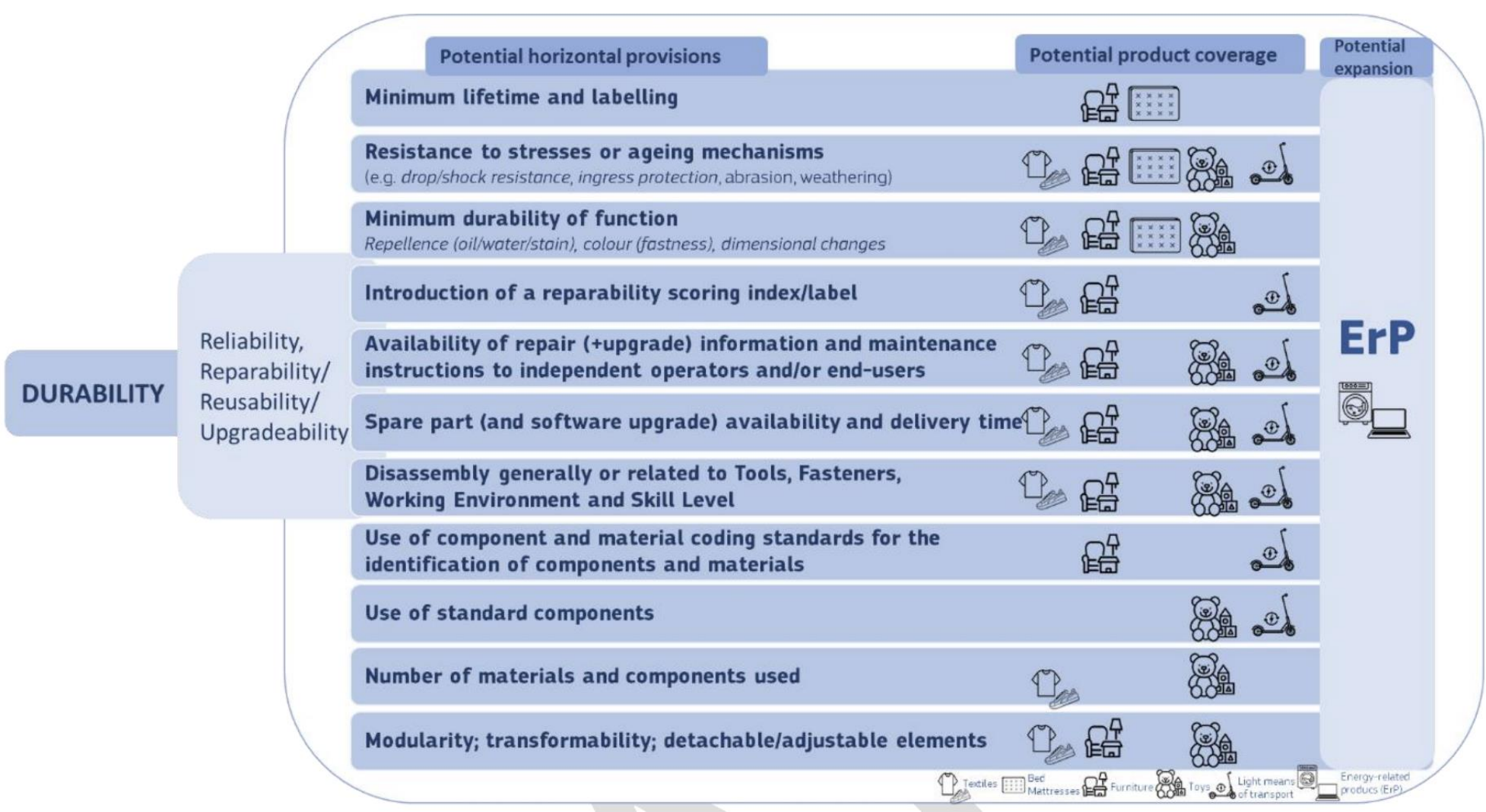
	WATER	AIR	SOIL	BIODIVERSITY	WASTE	CLIMATE CHANGE	ENERGY USE	HUMAN TOXICITY	MATERIAL EFFICIENCY	LIFETIME EXTENTION
Score 43 TEXTILES and FOOTWEAR	5	2	4	4	5	5	5	3	5	5
Score 30 FURNITURE	1	3	3	3	4	3	3	2	3	5
Score 30 CERAMICS PRODUCTS	3	3	3	3	3	4	4	1	3	3
Score 30 TYRES	3	4	3	3	3	3	3	2	3	3
Score 28 DETERGENTS	4	2	1	4	3	3	3	2	3	3
Score 26 BED MATTRESSES	1	3	1	2	5	3	3	2	3	3
Score 24 LUBRICANTS	2	2	2	2	2	3	3	2	3	3
Score 24 PAINTS	3	3	2	3	3	2	2	2	3	1
Score 23 COSMETICS	4	2	1	4	3	2	1	2	3	1
Score 22 TOYS	1	1	1	1	3	2	2	3	3	5
Score 21 FISHING GEARS	4	1	1	4	3	2	1	1	3	1
Score 18 ABSORBENT HYGIENE PRODUCTS	2	1	2	2	4	2	2	1	1	1

	WATER	AIR	SOIL	BIODIVERSITY	WASTE	CLIMATE CHANGE	ENERGY USE	HUMAN TOXICITY
Score 31 IRON & STEEL	5	5	2	2	4	5	5	3
Score 27 NON-FERROUS METAL PRODUCTS	3	2	3	2	5	4	5	3
Score 26 ALUMINIUM	1	4	4	3	4	4	4	2
Score 25 CHEMICALS	3	3	3	3	3	4	4	2
Score 23 PLASTICS	3	3	2	2	3	4	4	2
Score 22 PULP & PAPER	3	2	3	3	2	4	4	1
Score 19 GLASS	3	2	2	3	1	3	4	1

# Measures

Proposed horizontal measures for first consideration, including potential provisions, proposed product coverage and potential product scope expansion

# Durability



# Recyclability

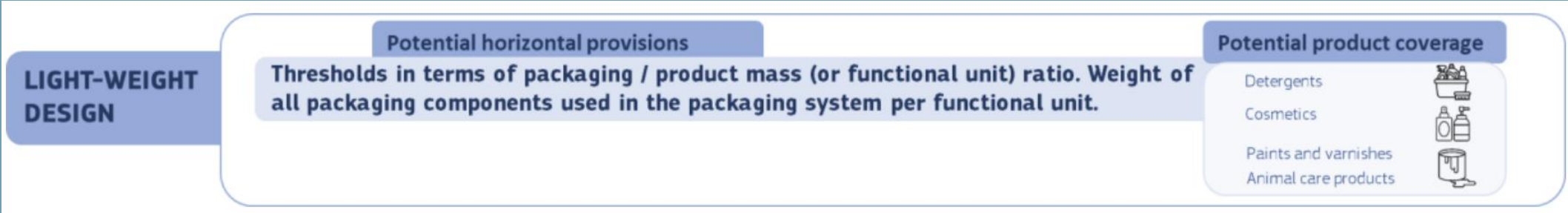


# Recycled Content

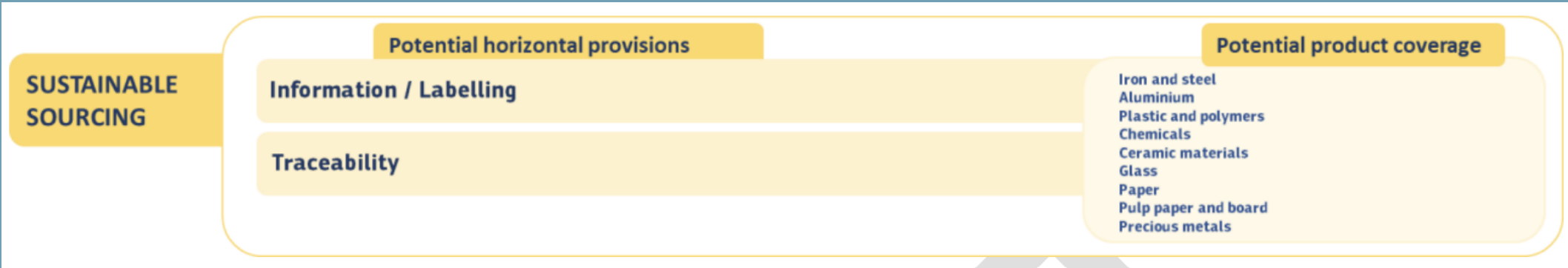




# Lightweight Design



# Sustainable Sourcing



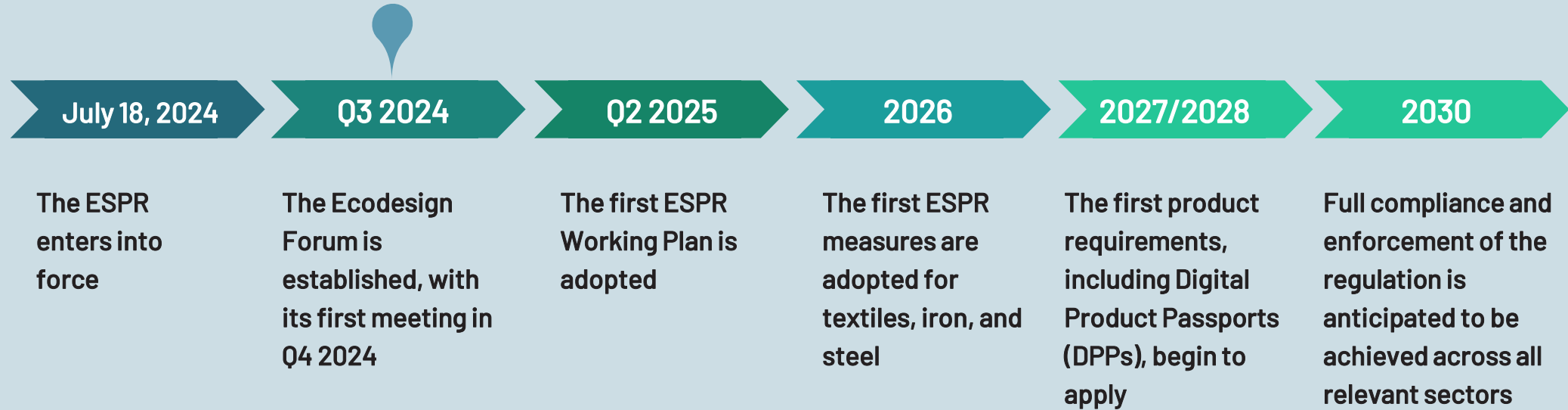


## PART 4:

# When and Who

# When

Timeline is in motion now





# Accommodations for SMEs

Exceptions are written in for SMEs and are designed to reduce the administrative and financial burden while ensuring compliance with environmental goals.

## Prohibition on the destruction of unsold products

The regulation's prohibition on destroying unsold consumer products (such as clothing and footwear) will apply to large enterprises two years after the regulation enters into force.

Medium-sized enterprises will have a six-year transitional period.

## Transparency obligations

SMEs, particularly medium-sized enterprises, have a six-year grace period before they must comply with the transparency obligations on disclosing discarded unsold consumer products.

For micro and small enterprises, these obligations do not apply at all.

## SME Support Measures

The regulation mandates that the Commission and Member States offer tailored support to SMEs.

This includes providing guidance, specialized training, and financial assistance to facilitate compliance with ecodesign requirements.

Enterprise size	Micro	Small	Medium
Employees	<10	<50	<250
+			
Annual Revenue	<€2M	<€10M	<€50M



PART 5:

# Next Steps

# Next Steps

**For apparel and hardgoods companies, compliance with the ESPR will require a focused approach addressing both product-specific sustainability goals and supply chain transparency. Here are specific steps you can start now:**

## **Evaluate Product Sustainability**

### **Material Selection**

- Focus on sustainable materials, such as recycled fibers, organic textiles, those with lower environmental impacts or products that include steel.
- The ESPR will likely set product-specific requirements on recycled content, durability, and recyclability.
- Companies should assess the percentage of recycled content in their products and aim to increase it where possible.

### **Product Longevity**

- Design products for longer life spans by enhancing durability.
- The ESPR emphasizes extending the life cycle of products by making them more durable and repairable.





# Next Steps

## Prepare for the Digital Product Passport (DPP)

### **Data Collection and Management**

- Companies will need to collect detailed information on the environmental footprint of their products, including the materials used, their recyclability, and the presence of any substances of concern.
- This information will be part of the DPP, which will be required for specific product groups.

### **Supply Chain Traceability**

- Ensure that supply chain partners can provide the necessary data on materials, chemicals, and production processes.
- A significant part of DPP compliance involves ensuring transparency along the entire value chain, including information on the sourcing of raw materials.

## Improve Repairability and Circularity

### **Design for Repairability**

- Companies should focus on designing products that are repairable (e.g. modular designs, easily replaceable components, etc.).
- The ESPR promotes repairability as a core aspect of product sustainability, and future regulations may include repairability scores for products.

### **Facilitate Recycling**

- Work on reducing the complexity of materials (e.g., avoiding multi-material blends that are hard to recycle) and ensure that garments can be easily disassembled for recycling purposes.

# Next Steps

## Plan for Compliance with Upcoming Standards

### Monitor Delegated Acts for the Apparel Sector

- Companies should closely follow the development of product-specific delegated acts under the ESPR, which will outline detailed requirements for the sector.
- Evaluate information as it is released to stay informed about new regulations and ensure timely compliance.

## Circular Economy Practices

### End-of-Life Management

- Develop or enhance take-back programs for used products to ensure they can be remanufactured, reused, or recycled.
- ESPR aims to reduce the environmental impact of products at the end of their life cycle.

### Re-manufacturing and Re-use

- Integrate remanufactured and reused materials into product lines where feasible, as remanufactured products may fall under ESPR regulations.



# Resources

## ESPR Overview

[https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation\\_en](https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation_en)

## ESPR Full Text

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1781&qid=1719580391746>

## FAQ

<https://circabc.europa.eu/ui/group/418195ae-4919-45fa-a959-3b695c9aab28/library/25c48e7c-9ce3-41cb-96ac-d2942a8a29d6/details?download=true>

## Preliminary Report

[https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/2023-01/Preliminary%20ESPR%20WP%20Report\\_MERGED\\_CLEAN\\_.pdf](https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/2023-01/Preliminary%20ESPR%20WP%20Report_MERGED_CLEAN_.pdf)

## 2022 Presentation

[https://commission.europa.eu/document/download/c5db3b9e-23ae-42c8-a50a-b549f20a377d\\_en?filename=2024\\_05\\_22\\_EC%20Presentation%20ESPR%20Webinar\\_final.pdf](https://commission.europa.eu/document/download/c5db3b9e-23ae-42c8-a50a-b549f20a377d_en?filename=2024_05_22_EC%20Presentation%20ESPR%20Webinar_final.pdf)







# Q&A

# Thank you!

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